

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS) MDL No. 2419
LIABILITY LITIGATION)
Plaintiffs,) Docket No. 1:13-md-2419 (RWZ)
)
This document relates to:)
)
Armetta, et al. v. Box Hill Surgery Center,)
LLC, et al.) **CONSENT MOTION FOR EXTENSION**
No. 1:14-cv-14022-RWZ) **OF TIME**
)
Bowman, et al. v. Box Hill Surgery Center,)
LLC, et al.)
No. 1:14-cv-14028-RWZ)
)
Davis, et al. v. Box Hill Surgery Center, LLC,)
et al.)
No. 1:14-cv-14033-RWZ)
)
Dreisch, et al. v. Box Hill Surgery Center,)
LLC, et al.)
No. 1:14-cv-14029-RWZ)
)
Farthing, et al. v. Box Hill Surgery Center,)
LLC, et al.)
No. 1:14-cv-14036-RWZ)
)
Kashi, et al. v. Box Hill Surgery Center, LLC,)
et al.)
No. 1:14-cv-14026-RWZ)
)
Torbeck, et al. v. Box Hill Surgery Center,)
LLC, et al.,)
No. 1:14-cv-14023-RWZ)
)
Handy v. Box Hill Surgery Center, LLC, et al.)
No. 1:14-cv-14019-RWZ)

By consent of the parties, the Plaintiffs in the above-captioned cases and Defendants Box Hill Surgery Center, LLC, Ritu T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D., LLC, by and through their undersigned counsel, move for modification of an Order of Court dated April 17, 2015, Document 1780 (copy attached as Exhibit A) for good cause.

In light of the passing of a family member of one of the Plaintiffs' attorneys, the parties request the Court to extend the time for filing an Opposition to Defendants' Motions to Dismiss as to claims for Strict Liability, violations of Maryland's Consumer Protection Statutes, violations of Massachusetts' Consumer Protection Statutes and claims for Punitive damages from June 1, 2015 to June 5, 2015.

Respectfully submitted,

/s/ Patricia J. Kasputys

Patricia J. Kasputys

Sharon L. Houston

Law Offices of Peter G. Angelos, P.C.

100 North Charles Street

22nd Floor

Baltimore, MD 21201

410-649-2000

Pkasputys@lawpga.com

Shouston@lawpga.com

Attorneys for Plaintiffs

/s/ Michael Coren

COHEN, PLACITELLA & ROTH, P.C.

Harry M. Roth

Michael Coren

Two Commerce Square

2001 Market Street

Philadelphia, PA 19103

215-567-3500

Attorneys for Plaintiffs

/s/ Gregory K. Kirby

Gregory K. Kirby

Pessin Katz Law P.A.

901 Dulaney Valley Road, Suite 400

Towson, Maryland 21204

(410) 938-8800

Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Patricia J. Kasputys, hereby certify that a copy of the foregoing document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF), including the attorneys representing the defendants in the above-referenced individual cases, and will be sent to these parties by operation of the CM/ECF system on May 29, 2015.

/s/ Patricia J. Kasputys
Patricia J. Kasputys